

# McTigue & McGinnis LLC

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RECEIVED  
FEDERAL ELECTION  
COMMISSION

2010 MAY -6 PM 1:10

OFFICE OF GENERAL  
COUNSEL

April 30, 2010

Federal Election Commission  
Office of General Counsel  
999 E Street, N.W.  
Washington, D.C. 20463

MUR # 6286

Re: Franklin County Democratic Party v. Our Democratic Organization, et al.

Dear Counsel:

Enclosed please find a Complaint for filing on behalf of the Franklin County Democratic Party. My firm will be representing the Complainant in this matter. Please do not hesitate to contact me if additional information is needed.

Very truly yours,



Donald J. McTigue

10044281007

**IN THE FEDERAL ELECTIONS COMMISSION**

Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

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OFFICE OF GENERAL  
COUNSEL

FRANKLIN COUNTY DEMOCRATIC PARTY  
271 East State Street  
Columbus, Ohio 43215

Complainant,

MUR No. 6286

-vs-

OUR DEMOCRATIC ORGANIZATION  
P.O. Box 16914  
Columbus, Ohio 43216

JEFFREY BOND

Canal Winchester, Ohio 43110

Respondents.

**COMPLAINT**

State of Ohio

/SS

Franklin County

I, Zach Manifold, first being duly sworn, hereby state the following based on personal knowledge:

1. I am Executive Director of the Franklin County, Ohio, Democratic Party.
2. Respondents have disseminated a communication expressly advocating the nomination of individuals to Federal office and, based on information and belief, have received contributions and/or made expenditures in excess of \$1,000 but have not registered with the Federal Elections Commission ("Commission"), nor filed periodic reports of receipts and expenditures as required by the Federal Election Campaign Act of 1971, as amended ("Act").

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3. A true copy of the communication is attached hereto and was issued and distributed by Respondents to registered voters through the United States Postal Service.
4. The Act defines a political committee as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year." 2 U.S.C. §431(4)(a).
5. The Act requires all political committees to register with the Federal Election Commission ("Commission") and file a statement of organization within ten days of becoming a political committee, including the name, address, and type of committee; the name, address, relationship, and type of any connected organization or affiliated committee; the name, address, and position of the custodian of books and accounts of the committee; the name and address of the treasurer of the committee; and a listing of all banks, safety deposit boxes, or other depositories used by the committee. See 2 U.S.C. §433.
6. Each treasurer of a political committee shall file periodic reports of the committee's receipts and disbursements with the Commission. See 2 U.S.C. §434(a)(1). In the case of committees that are not authorized committees of a candidate for Federal office, these reports shall include, *inter alia*, the amount of cash on hand at the beginning of the reporting period, see 2 U.S.C. § 434(b)(1); the total amounts of the committee's receipts for the reporting period and for the calendar year to date, see 2 U.S.C. § 434(b)(2); and the total amounts of the committee's disbursements for the reporting period and the calendar year to date. See 2 U.S.C. §434(b)(4).
7. **Allegation:** The above facts establish that Respondents have failed to register as a political committee and file periodic reports of receipts and expenditures in violation of the Federal Election Campaign Act of 1971, as amended.

WHEREFORE, Complainant asks that Respondents be found in violation of the Federal Election Campaign Act of 1971, as amended, and that appropriate sanctions be imposed.

FURTHER AFFIANT SAYETH NAUGHT.

FRANKLIN COUNTY DEMOCRATIC PARTY

BY:

  
Zach Manifold, Executive Director

Sworn to before me and subscribed in my presence, this 29 day of April, 2010.

  
Notary Public

DONALD J. McTIGUE, Attorney At Law  
Notary Public-State of Ohio  
My commission has no expiration date  
Section 147.09 R. C.

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10044281011

Tuesday, May 4th

On Tuesday, May 4th, you will have the opportunity to vote on your ballot. Please make sure you vote on your ballot.

Thank you

Your vote, voice & support  
is the Democratic Party!

Presort Standard  
U.S. Postage  
**PAID**  
Columbus, OH  
Permit #6766

5-DIGIT 43234

OR CURRENT RESIDENT

COLUMBUS OH 43234

T24 P3



## A guide for voting in the Democratic Primary

### Your State Candidates

- ✓ **Ted Strickland**  
for Governor
- ✓ **Yvette McGee Brown**  
for Lt. Gov.
- ✓ **Richard Cordray**  
for Attorney General
- ✓ **Kevin L. Boyce**  
for Treasurer
- ✓ **Maryellen O'Shaughnessy**  
for Secretary of State
- ✓ **David Pepper**  
for Auditor
- ✓ **Jennifer Brunner**
- ✓ **Lee Fisher**  
for U.S. Senate (vote for one)
- ✓ **Eric Brown**  
for Chief Justice of Supreme Court
- ✓ **Mary Jane Trapp**  
for Supreme Court
- ✓ **Mary Jo Kilroy**  
for Representative to Congress - 12th
- ✓ **Paula Brooks**  
for Representative to Congress - 12th
- ✓ **Bill Connor, Olivia Freeman, James J. Barton**  
for Representative to Congress - 7th (vote for one)

### Your Local Candidates

- ✓ **Mark Pfeiffer**  
for State Senate - 3rd
- ✓ **Marian Harris**  
for State Representative - 19th
- ✓ **Nancy Garland**  
for State Representative - 20th
- ✓ **David Robinson**  
for State Representative - 21st
- ✓ **Terry J. Brown**  
for Auditor
- ✓ **Marilyn Brown**  
for Commissioner
- ✓ for Common Pleas (vote for all)  
unopposed
- ✓ for Court of Appeals (vote for both)  
unopposed

#### BALLOT ISSUES

1. Proposed Constitutional Amendment To Extend the Ohio Third Frontier Program by authorizing the issuance of additional general obligation bond to promote economic growth ..... Yes or ..... No
2. Proposed Constitutional Amendment Change the location of the Columbus Cruise Facility authorized by previous Statewide Vote from the Arena District to the site of the former General Motors/Digital Corp on West Broad street ..... Yes or ..... No

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